01090

June 4, 1998

JUN 10 1998

Mr. Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

RE: **Comments on the Draft Programmatic Environmental Impact Statement/ Environmental Impact Report for the CALFED Bay-Delta Program- SCAG No. I 9800141**

Dear Mr. Breitenbach:

Thank you for submitting the **Draft Programmatic Environmental Impact Statement/ Environmental Impact Report for the CALFED Bay-Delta Program** to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG assists cities, counties and other agencies in reviewing projects and plans for consistency with regional plans.

SCAG's Standing Committee on Implementation approved the attached staff comments on June 4, 1998. The comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. If you have any questions regarding the attached comments, please contact Bill Boyd at (213) 236-1960 or boyd@scag.ca.gov.

SCAG has recently formed a Water Task Force, chaired by Art Brown, Councilmember, City of Buena Park, to consider the complex issues surrounding our region's water needs. The Task Force will continue to review the CALFED Bay-Delta Program documents and make recommendations to our Energy and Environment Committee, Standing Committee on Implementation and Regional Council. We appreciate CALFED's decision to release a Revised DEIR in late 1998 and look forward to working with you to develop recommendations that will be accepted by California's citizens and businesses. SCAG's contact person for the Water Task Force is Rich Macias at (213) 236-1805 or macias@scag.ca.gov.

Sincerely,

J. DAVID STEIN
Manager, Performance Assessment and Implementation

SOUTHERN CALIFORNIA ASSOCIATION of GOVERNMENTS

Main Office
818 West Seventh Street
12th Floor
Los Angeles, California
90017-3435

t (213) 236-1800
f (213) 236-1825

www.scag.ca.gov

C-011423

C-011423

**COMMENTS ON THE
DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT
STATEMENT/ENVIRONMENTAL IMPACT REPORT
FOR THE CALFED BAY-DELTA PTOGRAM**

PROJECT DESCRIPTION

The CALFED Bay-Delta Program is a cooperative effort by fifteen state and federal agencies with regulatory and management responsibilities in the San Francisco Bay-Sacramento/San Joaquin River-Bay Delta to develop a long-term plan to restore ecosystem health and improve water management for beneficial uses of the Bay-Delta System. The objective of this collaborative planning process is to identify comprehensive solutions to the problems of ecosystem quality, water use efficiency, water quality, Delta levee and channel integrity.

The Draft Programmatic EIS/EIR identifies twelve alternative methods to achieve this objective and analyzes the environmental impacts of each of those alternatives. Each of these alternatives includes the core programs which address the problem areas of ecosystem quality, water supply reliability, water quality, and Delta levee and channel integrity, water transfers, and watershed management coordination, as well as a range of storage and conveyance options. This is a programmatic-level document to choose a long-term plan, and by its nature focuses on the interrelated long-term and cumulative consequences of each of the alternatives. Implementation of the plan will follow the approval of a preferred program alternative, and subsequent environmental review for specific aspects of the program will be required.

The three alternatives and their twelve configurations considered in the Draft EIS/EIR are made up of various elements:

- Water Storage and Conveyance - Several options are under consideration including storage facilities ranging in size from 200,000 acre feet to 3.0 million acre feet of capacity. Conveyance elements would convey water from the north to south of the Delta, include through Delta facilities, modified through-Delta improvements, and a combination Dual Delta Conveyance.

- Ecosystem Restoration Program - A variety of programs are proposed to restore the ecological processes associated with streamflow, stream channels, watersheds and floodplains. These strategies would reduce the effects of stressors that inhibit ecological processes, habitats and species.

- Water Quality Program - A series of actions are proposed to improve water quality to support drinking water supply, recreation, agricultural and industrial water supply, and protection and enhancement of aquatic life. These programs address the complex issues associated with metals and trace elements; pesticides and other synthetic organic chemicals; minerals and nutrients; and, physical characteristics and pathogens.

- Water Use Efficiency Program - A series of local and regional level strategies are

C-011424

proposed to conserve and recycle water. State and federal agencies will facilitate these efforts by offering support and incentives through expanded programs to provide technical and financial assistance.

- Levee System Integrity Program – A five element program to improve levee system integrity will be relatively unchanged among the Delta alternatives. These include: base level protection plan; special improvement projects; island subsidence control plan; emergency management plan; and, seismic risk assessment.

- Water Transfers – A policy framework is established to resolve many of the issues that currently constrain transfers of raise concerns when transfers do occur. The framework is expected to provide an effective means of moving water between users on a voluntary and compensated basis, as well as providing incentive for water users to implement management practices which will improve water use efficiency. The policy framework will also focus on mechanisms to avoid or mitigate water transfer impacts to third parties and groundwater resources.

- Coordinated Watershed Management – Watershed management strategies will be included in each of the alternatives, and will focus on a comprehensive, integrated, ecosystem-wide approach to developing methods for protecting and enhancing beneficial uses of the Bay-Delta system. This effort will be based on a structure which address all aspects of watershed management on a intergovernmental, interagency and interwatershed coordination basis.

The three water conveyance alternatives, water storage configuration alternatives and related program elements are summarized in the following tables and detailed on Figure 2-3, 2-4 and 2-5.

Alternative 1 - Existing System Conveyance		
Water Storage	**Conveyance**	**Other Program Elements**
Varies from no new storage to: 3.0 MAF Upstream (Sac.) 1.0 MAF Off-Aqueduct 250 TAF Sac. Valley GW 500 TAF San Joaquin GW	Varies from existing Delta channels with no conveyance modifications to select south Delta modifications	Ecosystem Restoration Water Quality Water Use Efficiency Levee System Integrity Water Transfers Coordinated Watershed Mgmt.

Alternative 2 - Modified Through-Delta Conveyance		
Water Storage	**Conveyance**	**Other Program Elements**
Varies from no new storage to: 3.0 MAF Upstream (Sac.) 500 TAF Upstream (SJ) 2.0 MAF Off-Aqueduct 250 TAF Sac. Valley GW 500 TAF San Joaquin GW	Varies from channel modifications primarily for water conveyance to extensive modifications for water conveyance and habitat restoration	Ecosystem Restoration Water Quality Water Use Efficiency Levee System Integrity Water Transfers Coordinated Watershed Mgmt.

C-011426

Alternative 3 - Dual Delta Conveyance		
Water Storage	**Conveyance**	**Other Program Elements**
Varies from no new storage to: 3.0 MAF Upstream (Sac.) 500 TAF Upstream (SJ) 2.0 MAF Off-Aqueduct 250 TAF Sac. Valley GW 200 TAF In-Delta Storage 500 TAF San Joaquin GW	Through-Delta channel modifications vary from those primarily for water conveyance to those for water conveyance with extensive habitat restoration Isolated facility varies from small (5000 cfs) to large (15,000 cfs)	Ecosystem Restoration Water Quality Water Use Efficiency Levee System Integrity Water Transfers Coordinated Watershed Mgmt.

The CALFED Bay-Delta Program emphasizes the concept of adaptive management, which adjusts or refines management actions as a process unfolds and results are obtained. Adaptive management begins by implementing the actions most likely to achieve implementation objectives, given today's knowledge. Results are monitored and actions modified as necessary to achieve management goals.

Because of the complexity of the Bay-Delta system, the scope of the solution, and the cost associated with implementing the solution, the preferred program alternative will be implemented in stages over a number of years. The CALFED Program has established a Bay-Delta Advisory council Assurances workgroup to recommend the necessary mechanisms to implement the Bay-Delta solution. The preliminary list of tools and methods of assurance available to meet these needs include:

- Federal and State constitutional amendments
- Financing mechanisms
- Federal and State statutes
- Bond measures
- State voter referenda
- Market incentives
- Federal and State regulations
- Physical constraints
- Federal and State Judicial actions
- Parallel implementation
- President's and Governor's executive orders

C-011427

- Public oversight/public involvement processes
- Administrative agency orders
- Contracts
- New institutions
- Memoranda of understanding/agreement
- Multiple species protection plans
- Joint powers agreements
- Programmatic permitting

INTRODUCTION TO SCAG REVIEW PROCESS

The document that provides the primary reference for SCAG's project review activity is the **Regional Comprehensive Plan and Guide (RCPG)**. The RCPG chapters fall into three categories: core, ancillary, and bridge. The **Growth Management** (adopted June 1994), Regional Mobility (adopted June 1994), Air Quality (adopted October 1995), Hazardous Waste Management (adopted November 1994), and **Water Quality** (adopted January 1995) chapters constitute the core chapters. These core chapters respond directly to federal and state planning requirements. The core chapters constitute the base on which local governments ensure consistency of their plans with applicable regional plans under CEQA. The Air Quality and Growth Management chapters contain both core and ancillary policies, which are differentiated in the comment portion of this letter. The Regional Mobility Element (RME) constitutes the region's Transportation Plan. The RME policies are incorporated into the RCPG.

Ancillary chapters are those on the Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, **Water Resources**, Energy, and Integrated Solid Waste Management. These chapters address important issues facing the region and may reflect other regional plans. Ancillary chapters, however, do not contain actions or policies required of local government. Hence, they are entirely advisory and establish no new mandates or policies for the region.

Bridge chapters include the Strategy and Implementation chapters, functioning as links between the Core and Ancillary chapters of the RCPG.

Each of the applicable policies related to the proposed project are identified by number and reproduced below in italics followed by SCAG staff comments regarding the consistency of the Project with those policies.

Consistency With Regional Comprehensive Plan and Guide Policies

1. **The Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide contains a number of policies that are particularly applicable to the CALFED Bay-Delta Project.

a. ***Core Growth Management Policies***

3.01 The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of

C-011428

implementation and review.

SCAG staff comments. The Draft EIS/EIR in Chapter 8.6 (Regional Economics) includes a discussion of existing and forecasted year 2020 population and economic indices. The data is portrayed by major geographic region including the Delta, San Francisco Bay, Sacramento River, San Joaquin River and State Water Project (SWP)/Central Valley Projects (CVP) Outside the Central Valley. Portions of the State Water Project region, served by the Metropolitan Water District of Southern California, lie within the SCAG region. The population forecasts for these regions reflect California Department of Finance estimates. The economic forecasts were derived from CALFED's IMPLAN input-output data base.

The Draft EIS/EIR on page 8.2-30 acknowledges that "No Program alternatives are anticipated to have significant direct or indirect effects on urban land uses in the SWP and CVP Service Areas Outside the Central Valley". They specifically note that "the compatibility and consistency of potential CALFED actions with county and city general plans and local land use plans are not evaluated in this programmatic-level of analysis".

The population and water supply/use forecasts in Chapter 8 (Land Use, Social and Economic Issues) of the Draft EIS/EIR for the SWP portion of the SCAG region are consistent with forecasts contained in the Draft California Water Plan Update (Bulletin 160-98). SCAG's comments on this document noted that the forecasts do not include a comparison with the recently adopted RTP97 SCAG Population, Household and Employment forecasts for year 2020. These forecasts follow:

County Forecasts	Ventura	Los Angeles	Orange	Riverside	San Bernardino	Imperial	SCAG Region
Population	932,300	12,249,100	3,244,600	2,816,000	2,830,100	280,000	22,352,000
Households	326,400	3,984,100	1,102,300	918,000	904,900	84,600	7,320,000
Employment	485,500	5,817,600	2,116,600	960,800	1,103,400	89,900	10,574,000

We recommended that the Department of Water Resources contact SCAG's data unit and request a disaggregation of our recently adopted population, housing and employment forecasts to correspond with the boundaries of the South Coast, South Lahontan and Colorado River hydrologic regions. Based on the information provided in the Draft EIS/EIR, we are unable to determine whether the Bay-Delta Program is consistent with this core RCPG policy.

3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.

SCAG staff comments: The Draft EIS/EIR for the Bay-Delta Project details various alternative water related facilities, that although they are not located within the SCAG region, their timing, financing and location could impact the SCAG region's growth policies. Chapter 8 (Land Use, Social and Economic Issues) of the Draft EIS/EIR for the SWP portion of the SCAG region, discusses a number of potential growth and land

C-011429

use impacts on southern California as a result of implementing the various Bay-Delta alternatives. Among these stated impacts are:

"Agricultural water users in this region would receive some of the additional water supply developed by most of the configurations, ranging from about 60,000 to 700,000 acre-feet (annual average)" [page 8.1-29];

"Indirect changes in land use may result from the Water Use Efficiency Program. In some instances, agricultural land may be removed from production because of increased costs and decreased profitability which could result from required efficiency improvements or increased district water charges. Conversely, improved efficiency may allow the continued viability of agriculture in some areas." [page 8.1-29];

"Salinity intrusion avoidance benefits of the Levee System Integrity Program would also accrue to this region. Substantial conversion of agricultural land in the Delta Region could shift some production to desert areas in southern California, such as the Imperial Valley. Additional water would be available to SWP contractors in the South Coast. Potential charges imposed on agricultural water use to recover costs of program components could lead to significant changes in agricultural activities (such as, crop selection and water use)." [pages 8.a-37 and -38];

"Water transfers would increase agricultural production, incomes, and employment opportunities associated with any transfer that uses the water for agricultural production outside the Central Valley. The net change in jobs is expected to be minimal, with only minor effects on community stability" [page 8.1-43];

"No Program alternatives are anticipated to have significant direct or indirect effects on urban land uses in SWP and CVP service areas outside the Central Valley." [page 8.2-30]

The following table compares average costs for the no action and three alternatives (in millions of dollars per year) for the SWP and CVP service areas outside the Central Valley. This area, as noted previously, includes the South Coast portion of the SCAG region. For purposes of simplicity of understanding, costs for the various configurations of the alternatives have been averaged. As noted, the various Alternative 3 configurations would result in less annual costs to the South Coast region served by the State Water Project.

Economic Parameter	No Action	Alt. 1	Alt. 2	Alt. 3
Other water supply costs	601	556	502	460
Drought conservation costs	310	310	310	310
Drought make-up supply costs	685	635	590	491
Total drought costs	995	945	900	801

The Draft EIS/EIR in Chapter 8 details the increases in water availability to the southland as a result of selected representative alternative configurations. These increases are presented as percentage of the demand in average and dry years in the following table. As noted the Alternative 3B configuration would result in delivering a greater volume of

water to meet southland demands.

Representative Alternative	% of Average Demand	% of Dry Weather Demand
1C	2.4%	4.5%
2A	0.8%	0.3%
3B	2.8%	4.4%

Considering the generalized presentation and diversity of the land use and growth impact data in the Draft EIS/EIR, as noted above, it is likely that all of the alternatives would have generally supportive impacts on growth policies in the SCAG region. The Bay-Delta Program is consistent with this core RCPG policy.

b. ***Ancillary Growth Management Policies***

3.05 Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.

SCAG staff comments. The Bay-Delta Project alternative configurations would facilitate delivery of increased quantities SWP water to the southland over the No Action strategy. This would make more water of a higher quality available to serve existing as well as future development patterns. This additional water would help reduce the costs of infrastructure construction in southern California and facilitate the better use of existing facilities. The Bay-Delta Program is supportive of this ancillary RCPG policy.

3.07 Support subregional policies that recognize agriculture as an industry, support the economic viability of agricultural activities, preserve agricultural land, and provide compensation for property owners holding land in greenbelt areas..

SCAG staff comments. See previous staff comments on SCAG Policy 3.03 as they pertain to supporting agriculture in southern California. The Bay-Delta Program is generally supportive of this ancillary SCAG policy.

3.19 Support policies and actions that preserve open space areas identified in local, state, and federal plans.

SCAG staff comments. The Draft EIS/EIR in Chapter 8.3 (Recreational Resources) acknowledges that "implementing any of the CALFED alternatives would potentially result in a gain in open space/habitat uses, benefiting recreational opportunities". Although these recreational/open space/habitat benefits would occur primarily in the Bay-Delta region, they would benefit all Californians directly or indirectly. The Draft EIS/EIR on page 8.3-30 acknowledges that "Alternatives 1 and 2 would have negligible beneficial impacts on recreational resources due to improved water quality (in the SWP and CVP service areas outside the Central Valley.....In Alternative 3, water quality delivered is expected to be greatly improved because of the operations of the isolated facilities. This is expected to result in beneficial impacts on recreational opportunities at receiving reservoirs and canals". As a whole the alternatives would benefit open

C-011431

space/habitat/recreational resources. The Bay-Delta Program is supportive of this ancillary SCAG policy.

3.20 Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands and lands containing unique and endangered plants and animals.

SCAG staff comments. The Draft EIS/EIR in Chapter 7 (Biological) acknowledges that the Bay-Delta Program "will be implemented through the program of adaptive management, because the effects on the ecosystem are uncertain." This chapter includes an extensive discussion of potential impacts of the various alternatives on fisheries and aquatic ecosystems, and vegetation and wildlife.

Specifically, the Chapter 7.2 notes that with regard to impacts to vegetation and wildlife, the no action condition would adversely affect aquatic organisms. All of the alternatives would include the beneficial impacts of the Ecosystem Restoration and Water Quality programs, in addition to selective beneficial and adverse impacts. Alternative 1 would result in the following adverse impacts: increased entrainment loss, reduced productivity, delayed migration of fish species, and adverse impacts to spawning and rearing habitat. Alternative 2 would have similar impacts, including additional habitat loss or degradation. Alternative 3 would result in an increase in fisheries and aquatic ecosystem beneficial impacts over the other alternatives, but operation of isolated facilities could result in increased entrainment mortality and habitat degradation. The Ecosystem Restoration and Water Quality programs would benefit many aquatic species through increased habitat abundance and improved habitat conditions. The Draft EIS/EIR on page 7.1-41 acknowledges that implementation of the CALFED alternatives would have minimal impact on fisheries and aquatic resources in southern California, although some potential exists for an increase in organisms transported with an increased quantity of water, in addition to the potential for introduction of non-native species. Alternative 3 would appear to best support the intent of this SCAG policy, as it relates to fisheries and aquatic ecosystems.

Specifically, the Chapter 7.1 notes that with regard to impacts to vegetation and wildlife, the no action condition is similar to the existing conditions, except for enhancement projects planned for future implementation. Alternative 1 would result in minimal adverse impacts on vegetation and wildlife communities. Alternative 2 would have greater impacts, but will provide benefits to some species as a result of enhancement and creation of habitat. Alternative 3 would result in the most adverse impacts to vegetation and wildlife, resulting from increased facility construction. The Ecosystem Restoration and Water Quality Programs will lead to improved habitats under all alternatives. The Draft EIS/EIR on page 7.2-32 acknowledges that implementation of the CALFED alternatives could result in the loss of some habitats, and result in the loss or degradation of wetland or riparian communities in southern California as a result of increased urban and industrial growth. Alternative 1 would appear to best support the intent of this SCAG policy, as it relates to vegetation and wildlife communities.

The Bay-Delta Program is supportive of this ancillary SCAG policy.

2. The Water Quality Chapter (WQC) core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters. The core recommendations and policy options that are particularly applicable to CALFED Bay-Delta Program include the following:

11.01 Streamline water quality regulatory implementation. Identify and eliminate overlaps with other regulatory programs to reduce economic impacts on local businesses.

SCAG staff comments. Chapter 2.3.2.3 of the Draft EIS/EIR includes an extensive discussion of the Bay-Delta Water Quality Program. All of the alternatives will result in water quality improvements for SCAG areas served by SWP water. Alternative configuration 3C would result in the greatest overall water quality improvement, resulting in an estimated 14 to 41% reduction in salinity for a net benefit of $180 million. Numerous water quality benefits will occur in the Delta area as a result of the water quality program measures. We encourage the CALFED Bay-Delta Program to specifically support the elimination of overlaps in water quality programs and their enforcement, with a specific reference to reducing economic impacts on local business. The Bay-Delta Program is generally consistent with this core RCPG policy.

11.02 Encourage "watershed management" programs and strategies, recognizing the primary role of local government in such efforts.

SCAG staff comments. The CALFED Bay-Delta program includes a wide range of watershed management programs and strategies, including: water storage and conveyance, ecosystem restoration, water quality improvement, water use efficiency, levee system integrity, water transfers, and coordinated watershed management. The coordinated watershed management approach focuses on: providing intergovernmental, interagency, and interwatershed coordination of restoration and management efforts including data collection, implementation and monitoring of results. The planning process takes advantage of local watershed management councils which involve various local stakeholders. The Draft EIS/EIR acknowledges important role of water agencies in watershed management, but fails to the emphasize the primary role of local governments, including cities, counties and subregional agencies (associations of governments) in developing watershed management programs. The discussion of watershed oversight in the Watershed Management Strategy Technical Appendix and at appropriate locations in the Draft EIS/EIR should emphasize the primary role of local government in the coordinated watershed management process. The Bay-Delta Program partially consistent with this core RCPG policy.

11.03 Coordinate watershed management planning at the subregional level by (1) providing consistent regional data; (2) serving as a liaison between affected local, state, and federal watershed management agencies; and (3) ensuring that watershed planning is consistent with other planning objectives (e.g., transportation, air quality, water supply).

C-011433

SCAG staff comments. The focus of the CALFED Bay-Delta Program is on both local and statewide coordinated watershed management. The Draft EIS/EIR's orientation toward alternative strategies and major programs that focus on large hydrologic regions fails to recognize the importance of coordinated planning at the subregional level. For example, within the SCAG region, there are currently 14 subregions (Arroyo Verdugo, City of Los Angeles, Coachella Valley Association of Governments, Imperial Valley Association of Governments, North Los Angeles County, Orange County Council of Governments, San Bernardino Associated Governments, San Gabriel Valley Council of Governments, South Bay Cities Association, Gateway Cities Council of Governments, Ventura Council of Governments, Western Riverside Council of Governments, Westside Cities and Las Virgenes Malibu Conejo Council). SCAG works with and relies on data and planning input from these subregions in our ongoing watershed management planning activities. We encourage the CALFED Bay-Delta Program to recognize the important role of subregions in (1) providing consistent regional data; (2) serving as a liaison between affected local, state, and federal watershed management agencies; and (3) ensuring that watershed planning is consistent with other planning objectives (e.g., transportation, air quality, water supply). The Bay-Delta Program is partially consistent with this core RCPG policy.

11.04 Encourage opportunities for pollution reduction marketing and other market-incentive water quality programs as an alternative to strict command-and-control regulation.

SCAG staff comments. The CALFED Bay-Delta Program Technical Appendix on Water Quality Program includes a number of references to market-based incentive solutions which address urban and industrial runoff, wastewater and industrial discharge, agricultural drainage and runoff, water treatment, water management, and human health. Among the methods emphasized in the Draft Program are: incentives to reduce copper, zinc, and cadmium from urban and industrial runoff; source control incentives for chlorpyrifor and diazinon pesticide removal; source control incentives for nutrient loading reduction; financial and regulatory incentives for removal of oxygen depleting substances from wastewater and industrial discharges; voluntary landowner participation and compensated arrangements to reduce selenium and salinity loadings from agricultural runoff; incentives and assistance for implementation of agricultural land use practices and strategies to reduce sediment loadings; and, various incentives to reduce pathogens, turbidity and bromides in water treatment facilities. The Bay-Delta Program is consistent with this core RCPG policy.

11.05 Support regional efforts to identify and cooperatively plan for wetlands to facilitate both sustaining the amount and quality of wetlands in the region and expediting the process for obtaining wetlands permits.

SCAG staff comments. The Draft EIS/EIR acknowledges in Chapter 7.2 (Vegetation and Wildlife) the most of the alternatives will have significant but mitigable impacts on wetland and riparian communities in the Delta Region, Sacramento River Region and southern California. Specifically, in southern California, the Draft EIS/EIR notes that increased urban and industrial growth that will be facilitated by an increase in the supply and reliability of water resulting from Bay-Delta programs, will result in loss or

degradation of wetland and riparian communities. The Bay-Delta Program is consistent with this core RCPG policy.

11.06 Clean up the contamination in the region's major groundwater aquifers since its water supply is critical to the long-term economic and environmental health of the region. The financing of such clean-ups should leverage state and federal resources and minimize significant impacts on the local economy.

SCAG staff comments. The Draft EIS/EIR acknowledges in Chapter 6.2 (Groundwater Resources) that the three alternatives would have significant groundwater benefits over the no action alternative. These benefits would accrue to southern California, largely by making more SWP water available which could supplement local groundwater supply in certain areas and facilitate the cleanup of groundwater basins by providing supplemental water for mixing. This water could partially offset groundwater overdrafts. The Bay-Delta Program is consistent with this core RCPG policy.

11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.

SCAG staff comments. The Draft EIS/EIR acknowledges in Chapter 2.3.2 (Overview of Alternative Elements) that the Water Use Efficiency Program will facilitate a number of water recycling actions, including: helping urban and agricultural water conservation councils facilitate water reclamation/recycling; expand state and federal conservation and recycling programs; help water suppliers comply with federal regulations on urban water management; and, provide regional planning assistance which can increase opportunities for use of recycled water. The Bay-Delta Program is consistent with this core RCPG policy.

11.08 Ensure wastewater treatment agency facility planning and facility development be consistent with population projections contained in the RCPG, while taking into account the need to build wastewater treatment facilities in cost-effective increments of capacity, the need to build well enough in advance to reliably meet unanticipated service and storm water demands, and the need to provide standby capacity for public safety and environmental protection objectives.

SCAG staff comments. SCAG has worked with wastewater treatment facility providers in the southland to ensure that their facilities are developed in a manner consistent with population projections contained in the Regional Comprehensive Plan and Guide. In light of the important role that recycling of wastewater plays in the southern California's wastewater facility planning, it is important that the planning and sizing of treatment facilities be closely coordinated with regional growth forecasts. We ask that the Draft EIS/EIR for the Bay-Delta Project be revised to acknowledge the importance of coordination of water planning with regional plans and the use of regional growth forecasts in water and wastewater facility design. Based on the information in the Draft EIS/EIR, we are unable to determine that the Bay-Delta Program is consistent with this

C-011435

core RCPG policy.

3. The Water Resources Chapter (WRC) is a non-mandated chapter, and it is provided for information and advisory purposes. The recommendations contained in this chapter to fulfill the stated goals and objectives do not create new legal mandates for local governments or other regional organizations. SCAG signed a Memorandum of Understanding (MOU) with the Metropolitan Water District (MWD), the largest wholesale water agency in the region, to develop the WRC. The WRC also includes projections of water supply and demand for areas within the SCAG region, outside the boundaries of MWD. Population and growth projections on which the WRC was based, were developed through the year 2010, and have not been updated to reflect recently adopted SCAG growth forecasts through the year 2020.

Projected Water Demand in the MWD Service Area in 2010 (Million Acre Feet)

County	2010
Los Angeles	1.93
Orange	0.73
Riverside	0.62
San Bernardino	0.30
Ventura	0.15
Within SCAG Region	**3.73**
San Diego	0.81
MWD Service Area	**4.54**

SCAG staff comments. The Draft EIS/EIR acknowledges that the Bay-Delta Project utilizes Draft California Water Plan Update 1995 and 2020 forecasted South Coast region water demand for urban, agricultural and environmental water use under average and drought conditions. These forecasts are generally consistent with an extrapolation of the above MWD forecasts, which were based in part on SCAG-94 forecasts. We encourage the CALFED to utilize currently adopted SCAG and other council of government's growth forecasts for population, housing, and employment as inputs to subsequent runs of the urban water use forecasting model. The Bay-Delta Program is generally supportive of this ancillary RCPG policy.

C-011436

Potential Water Supply for the MWD Service Area in 2010 (Million Acre Feet)

	Average Year Supply	Minimum Year Supply
Existing Supplies		
Local Production	1.05	1.05
Reclaimed Water	0.40	0.40
Los Angeles Aqueducts	0.37	0.12
Colorado River	0.62	0.62
State Water Project	1.56	0.21
Total	**4.00**	**2.40**
Potential Increases in Supplies		
Additional Colorado River	0.45	0.45
Additional SWP & Transfer	0.20	1.13
Reclaimed Water	0.27	0.27
Groundwater Recovery	0.10	0.10
Total	**1.02**	**1.95**
Total Supplies	**5.02**	**4.35**

SCAG staff comments. The Draft EIS/EIR acknowledges that the Bay-Delta Program utilizes Draft California Water Plan Update 1995 and 2020 forecasted South Coast region water forecasts under average and drought conditions. The Draft California Water Plan Update in Chapter 7 of Volume 2 (Table 7-21), identifies 1995 and 2020 estimated South Coast region water (surface water, groundwater, recycled and/or desalted) supplies under average and drought conditions. These estimates are generally consistent with an extrapolation of the above MWD estimates, which were based in part on local water agency plans and studies. The Bay-Delta Program is generally supportive of this ancillary RCPG policy.

C-011437

Strategies to Balance Supply and Demand in MWD Service Area in 2010 (Million Acre Feet)

	Average Year Conditions	Minimum Supplies Condition
BMP's	0.56	0.56
Existing Conservation	0.21	0.21
Rationing		0.49
Total Demand Reduction	**0.77**	**1.26**

SCAG staff comments. The Draft EIS/EIR acknowledges that the Bay-Delta Program utilizes Draft California Water Plan Update 1995 and 2020 forecasted potential gain in water supplies by application of the options most likely to be implemented in the South Coast region by 2020 under average and drought conditions. These estimates are generally consistent with an extrapolation of the above MWD estimates, which were based in part on local water agency plans and studies. The Draft Plan estimates are more optimistic than the older MWD figures, which is indicative of the identification of additional options to meet shortfalls under average and drought conditions. Of particular significance is the Draft Plan's 2020 remaining shortfall under drought conditions of 25 thousand acre feet . This number represents a reduction from the 44 thousand acre feet shortfall in the 2010 WMD estimate. It would signify less of a need for rationing under drought conditions, if all of the identified options are successfully implemented. The Bay-Delta Program is generally supportive of this ancillary RCPG policy.

Programs to Meet Future Water Demands

1. State Water Project Programs

- South Delta Improvements
- Kern Water Bank
- Los Banos Grande Reservoir

SCAG staff comments. The Draft EIS/EIR acknowledges the above three SWP programs, in addition to the three alternative supply/conveyance programs that makeup the Bay-Delta Program, will result in increased water to meet southland needs. Alternative 3 configurations will result in the greatest increases in SWP supply and availability. State Water Project users south of Kern County would receive increased SWP water supply of 2,468 TAF in 2020. The Bay-Delta Program is generally supportive of this ancillary RCPG list of programs, in addition to providing the projects that flow from the program itself.

2. Water Transfer and Exchange Programs

- Arvin-Edison/MetropolitanWater Storage and Exchange Program

C-011438

- Semitropic/Metropolitan Water Storage and Exchange Program
- Dudley Ridge/Metropolitan Water Transfer Program

SCAG staff comments. The Draft EIS/EIR acknowledges in Chapter 2.3.2.6 (Water Transfers) that the Bay-Delta Program includes a comprehensive policy framework for water transfer rules, baseline data collection, public disclosure, and analysis and monitoring of water transfers, both short-and long term. It acknowledges that the specific water transfers, however, will be dependent on locally developed agreements and assurances. The Bay-Delta Program is generally supportive of this ancillary RCPG list of programs, in addition to providing the projects that flow from the program itself.

3. Local Management Strategies

- Water Reclamation
- Groundwater Management Programs
- Groundwater Recovery
- Surface Water Management
- Desalination
- Gray Water

SCAG staff comments. The Draft EIS/EIR addresses water reclamation, groundwater management, groundwater recovery and surface water management programs and projects that would be facilitated by the Bay-Delta Program. The Bay-Delta Program is generally supportive of this ancillary RCPG list of strategies, in addition to providing the projects that flow from these strategies.

4. Management Response During Drought or Other Emergencies

SCAG staff comments. The Draft EIS/EIR addresses drought management under the Bay-Delta Program's water use efficiency program. This program identifies a total of 4,080,000 acre-feet annually of new water savings statewide that accrue from urban conservation, agricultural conservation and urban recycling strategies. The Bay-Delta Program is generally supportive of this ancillary RCPG list of strategies, in addition to providing the projects that flow from these strategies.

Potential Water Issues

1. Growth Management

Issue: *What is the relationship between growth management and water supply?*

Planning Strategy: *MWD commitment to continuing to accommodate population growth and to remain consistent with regional growth management plans.*

SCAG staff comments. See previous staff comments on SCAG's RCPG policies 3.01

C-011439

and 11.08 and the discussion under "Projected Water Demand in the MWD Service Area in 2010". The Bay-Delta Program is partially supportive of this ancillary RCPG planning strategy.

2. Water Transfer Policies

Issue: *What role will water transfers (also known as water marketing) take in the future to respond to the water needs of urban, agricultural and environmental users- statewide and in Southern California?*

Planning Strategy: *MWD commitment to develop a full range of voluntary transfers with willing partners, that protect, and where feasible, enhance environmental resources.*

SCAG staff comments. See previous staff comments on SCAG's RCPG policies 3.07, 3.19 and 11.04 and the Water Resource Chapter discussion on "Water Transfer and Exchange Programs". The Bay-Delta Program is supportive of this ancillary RCPG planning strategy.

3. Water Supply Development and Environmental Regulations

Issue: *What strategies can water agencies take for future development of water supplies and facilities in view of increasingly stringent environmental regulations?*

Planning Strategy: *MWD integrates environmental values in its decision making procedure for water resources and facilities development. Environmental needs for available water supply and protection of endangered species and their habitats offer a significant challenge to MWD and its member agencies to develop effective physical, institutional, and management solutions that lead to "win-win-win" outcomes for the environment, agricultural and urban users.*

SCAG staff comments. The Draft EIS/EIR incorporates a comprehensive series of strategies that address ecosystem restoration, which address restoration of ecosystem functions and the recovery of Bay-Delta species. Two extensive technical appendices detail the Ecosystem Restoration Program plan. The Draft EIS/EIR discusses environmental water uses from a statewide perspective, and acknowledges that although southern California's environmental water uses are not as great as those in the Bay-Delta, all Californian's bear responsibility for helping to maintain and enhance Bay-Delta ecosystem resources. Given southern California's extensive use of State Water Project water, local government has a responsibility to continue to support protection and enhancement of environmental water uses in both the north and south. The Bay-Delta Program is generally supportive of this ancillary RCPG planning strategy.

4. Desalination

Issue: *How could desalination contribute to future water supply?*

C-011440

Planning Strategy: *MWD is currently supporting brackish groundwater desalinization through its Groundwater Recovery Program and actively supporting and participating in research efforts for ocean desalination.*

SCAG staff comments. The Draft EIS/EIR acknowledges that the Bay-Delta Program will result in a reduction in the salinity of SWP waters available to southern California. Chapter 8.2 (Urban Resources) acknowledges that configuration 3C will result in a 14 to 41% reduction in salinity for a net benefit of $180 million annually in southern California in comparison to the No Action alternative. The Bay-Delta Program is generally supportive of this ancillary RCPG planning strategy.

5. Conservation of Storm Runoff

Issue: *How can conservation of storm runoff enhance the region's water supply?*

Planning Strategy: *It is imperative to maintain existing recharge basins in the San Gabriel and Santa Ana river systems at optimum percolation rates with debris management programs and prevent potential contamination of groundwater from urban runoff into recharge areas. Specific projects which would afford an increase in storm runoff capture, like the Long Beach Harbor/Los Angeles River project and maximizing use of existing dams and reservoirs, could increase groundwater recharge.*

SCAG staff comments. The Draft EIS/EIR acknowledges in Chapter 2.3.3 Alternative Description Summaries) that all three alternative scenarios include project designs that range from no new storage to over 6.0 MAF of storage. The alternatives which include new storage will result in the capture of storm water and melt water runoff, depending on location. The Bay-Delta Program is generally supportive of this ancillary RCPG planning strategy.

6. Potential for Increases in the Use of Reclaimed Water

Issue: *What is the potential of increasing the use of reclaimed water?*

Planning Strategy: *Reclaimed water is a reliable resource which can be used to augment existing supplies and among the efforts that should be pursued include seeking political support, understanding benefit cost analysis, overcoming funding issues, resolving regulatory issues and getting greater public acceptance.*

SCAG staff comments. See previous staff comments on SCAG's RCPG policies 11.04 and 11.07 and the Water Resource Chapter discussions on "Local Management Strategies" and "Management Response During Drought and Other Emergencies". The Bay-Delta Program is generally supportive of this ancillary RCPG planning strategy.

Water Supply in the Non-MWD Area

C-011441

1. Reliability of Imported Sources

SCAG recognizes that a number of issues need to be resolved before water transfers can be successful and recommends initiating a dialog among local governments, water districts, and the State of California on issues of land use, water resources and water marketing.

SCAG staff comments. See previous staff comments on SCAG's RCPG policies 3.07, 3.19 and 11.04 and the Water Resource Chapter discussions on "Water Transfer and Exchange Programs" and "Water Transfer Policies". The Draft EIS/EIR acknowledges that the Bay-Delta Program will significantly increase the reliability of imported SWP water for those non- MWM areas of the SCAG region which presently receive SWP water. The Bay-Delta Program is supportive of this ancillary RCPG planning issues resolution.

2. Groundwater Quality

SCAG recognizes a concern by many water agencies outside of MWD of groundwater contamination and overdraft conditions in some areas.

SCAG staff comments. See previous staff comments on SCAG's RCPG policies 3.20, 11.01 and 11.06. The Bay-Delta Program is supportive of this ancillary RCPG planning issues resolution.

3. Drinking Water Quality Standards

SCAG recognizes a concern by several water providers of the increasing costs of meeting treatment requirements under Federal and State drinking water laws.

SCAG staff comments. The Draft EIS/EIR in Chapters 8.1 (Agricultural Resources) and 8.2 (Urban Resources) includes a discussion on water quality problems and costs. Alternative configurations which result in reduced salinity levels in SWP water will help non-MWH water providers in meeting State and Federal drinking water standards. The Bay-Delta Program is generally supportive of this ancillary RCPG planning issues resolution.

Consistency with the Resolution in Support of Consensus Planning to Address the Use of Surplus Water in the Colorado River System

On December 4, 1997 SCAG approved Resolution #97-381-1 in support of consensus planning to address the use of surplus water in the Colorado River system. The resolution acknowledges the following:

- The continued economic well-being of the urban, business and agricultural sectors of southern California depend on a reliable and affordable supply of water from the Colorado River.

- Many of SCAG member jurisdictions are dependent either solely or in part on water supplies from the Colorado River.
- The water supplies needed by these SCAG member jurisdictions and in southern California as a whole are threatened by the historic and continuing use of surplus water in the Colorado River system.
- That although David Kennedy, Director of the California Department of Water Resources, is currently working with the Colorado River Board of California to construct a consensus plan to address the historic use of California's surplus water of Colorado River water, no consensus on this issue has yet been reached.

The resolution resolves the following:

- *SCAG supports the continuing efforts of Director Kennedy and the Colorado River Board of California to construct a consensus plan to address the historic use of California's surplus water of Colorado River water.*

- *SCAG specifically supports a plan which calls for the historic use of surplus water to be addressed with a combination of water transfers as the result of conservation in the agricultural sectors and a reasonable wheeling cost that facilitates water transfers but does not result in cost shifting or reduction in water service reliability for non-participating agencies.*

SCAG staff comments. See previous staff comments on SCAG's RCPG policies 3.07, 3.19 and 11.04 and the Water Resource Chapter discussion on "Water Transfer and Exchange Programs". The Bay-Delta Program will provide additional water and a more reliable source of water to meet southern California's water needs, especially those which will be impacted by a reduction of water from the Colorado River. Although the Draft EIS/EIR begins to address some of the water transfer issues raised by this SCAG resolution, it does not address the matter of reasonable wheeling costs nor the shifting of costs or reduction of service reliability for non-participating agencies. The Bay-Delta Program is partially supportive of this SCAG resolution.

Conclusions and Recommendations

(1) As noted in the staff comments, the proposed Draft EIS/EIR for the Bay-Delta Program is consistent with or supports many of the core and ancillary policies in the Regional Comprehensive Plan and Guide. The comments also identifies instances where the Bay-Delta Program partially supports or is consistent with SCAG policies. In some instances we are unable to assess consistency or support, because of the lack of information in the Draft EIS/EIR for the Bay-Delta Program.

(2) For the reasons stated herein, the Bay-Delta Program is only partially supportive of SCAG Resolution #97-381-1 regarding consensus planning to address the use of surplus water in the Colorado River system.

C-011443

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Roles and Authorities

THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS is a ***Joint Powers Agency*** established under California Government Code Section 6502 et seq. Under federal and state law, the Association is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). Among its other mandated roles and responsibilities, the Association is:

- Designated by the federal government as the Region's ***Metropolitan Planning Organization*** and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. §134(g)-(h), 49 U.S.C. §1607(f)-(g) et seq., 23 C.F.R. §450, and 49 C.F.R. §613. The Association is also the designated ***Regional Transportation Planning Agency***, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080.

- Responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the ***South Coast Air Quality Management Plan***, pursuant to California Health and Safety Code Section 40460(b)-(c). The Association is also designated under 42 U.S.C. §7504(a) as a ***Co-Lead Agency*** for air quality planning for the Central Coast and Southeast Desert Air Basin District.

- Responsible under the Federal Clean Air Act for determining ***Conformity*** of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. §7506.

- Responsible, pursuant to California Government Code Section 65089.2, for ***reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans*** required by Section 65080 of the Government Code. The Association must also evaluate the consistency and compatibility of such programs within the region.

- The authorized regional agency for ***Inter-Governmental Review*** of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

- Responsible for reviewing, pursuant to Sections 15125(b) and 15206 of the CEQA Guidelines, ***Environmental Impact Reports*** of projects of regional significance for consistency with regional plans.

- The authorized ***Areawide Waste Treatment Management Planning Agency***, pursuant to 33 U.S.C. §1288(a)(2) (Section 208 of the Federal Water Pollution Control Act)

- Responsible for preparation of the ***Regional Housing Needs Assessment***, pursuant to California Government Code Section 65584(a).

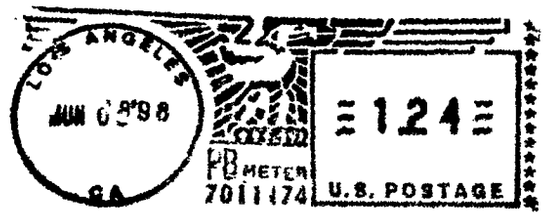
- Responsible (along with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council) for preparing the ***Southern California Hazardous Waste Management Plan*** pursuant to California Health and Safety Code Section 25135.3.

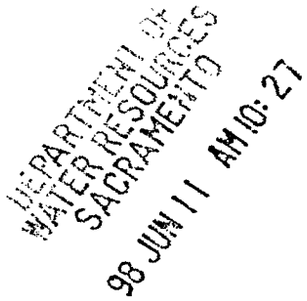
Revised January 18, 1995

C-011444

SOUTHERN CALIFORNIA
ASSOCIATION of GOVERNMENTS

818 West Seventh Street, 12th Floor Los Angeles, California 90017-3435





SOUTHERN CALIFORNIA
ASSOCIATION of GOVERNMENTS

818 W. 7th St. 12th Floor • Los Angeles, California 90017-3435

Mr. Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

C—011445